

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/7/2025

Kauff Laton Miller LLP

810 Seventh Avenue, 33rd Floor
New York, NY 10019

Adam Kauff
(212) 906-3441
akauff@klmlp.com

July 2, 2025

VIA ECF

MEMO ENDORSED

Hon. Valerie E. Caproni
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007

Re: Robert C. Bass v. Pershing, et al.
Case No. 25-CV-02478-VEC

Dear Judge Caproni:

We represent Defendant Citigroup Global Markets Inc. (“Citi”) in the above-referenced proceeding. We write in accordance with Paragraph 1 of the May 13, 2025 Notice of Initial Pretrial Conference and Section 2.C of the Court’s Individual Practices in Civil Cases to respectfully request an adjournment of the Initial Pretrial Conference (“IPTC”), which is currently scheduled to be held on July 25, 2025 at 10:00 a.m. This is the first request to adjourn the IPTC.

Citi respectfully requests an adjournment of the IPTC because of the Amended Complaint that Plaintiff filed on June 24, 2025. As with Plaintiff’s original Complaint, Citi (and the other Defendants) will be moving to dismiss the Amended Complaint, and it believes that it is in the interests of judicial economy to adjourn the IPTC in light of the anticipated motions. An adjournment is also consistent with Section 5 of the Court’s Individual Practices in Civil Pro Se Cases, which contemplates scheduling an initial case management conference within four months of the filing of the complaint. Since the operative complaint is now the Amended Complaint, Citi respectfully requests that the IPTC be adjourned to October 10 or 17, 2024, both of which proposed dates are within four months of the filing of the Amended Complaint.

The other Defendants have consented to this request. Plaintiff objects to the request on the grounds that (i) Citi was allowed an initial extension of time to file its response to his original complaint; (ii) under the May 13, 2025 Notice of IPTC, Citi is required to submit a joint letter to the Court by July 17, 2025; (iii) Citi’s request is for purposes of unnecessary delay; (iv) Citi has been engaged in dispute resolution with Plaintiff since April/May 2023; (v) Citi has been aware of Plaintiff’s request to add Pershing as a Defendant and include the same civil RICO claims since 2024 during the FINRA arbitration; (vi) Citi was provided with a proposed draft copy of Plaintiff’s amended claims during the FINRA arbitration and was aware Plaintiff was intending to proceed with his claims in Federal Court; (vii) Section 5 of the Court’s Individual Practices in

Kauff Laton Miller LLP

Civil Pro Se Cases does not provide a definitive four month allowance and/or discretionary authority to reschedule an IPTC for an amended complaint; and (viii) Citi has not presented any good cause for an adjournment.

Thank you for your consideration of this request.

Respectfully,

/s/ Adam Kauff

Adam Kauff

Application GRANTED. The Initial Pretrial Conference scheduled for Friday, July 25, 2025, at 10:00 A.M. is ADJOURNED to **Friday, October 17, 2025, at 10:00 A.M.** The deadline for the parties to submit a joint letter and proposed Case Management Plan in accordance with the Court's prior Order at Dkt. 53 is ADJOURNED from Thursday, July 17, 2025, to **Thursday, October 9, 2025.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

7/7/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE